UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES PRACTICES AND SECURITIES LITIGATION

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

MDL No. 17-2795 (MJD/KMM)

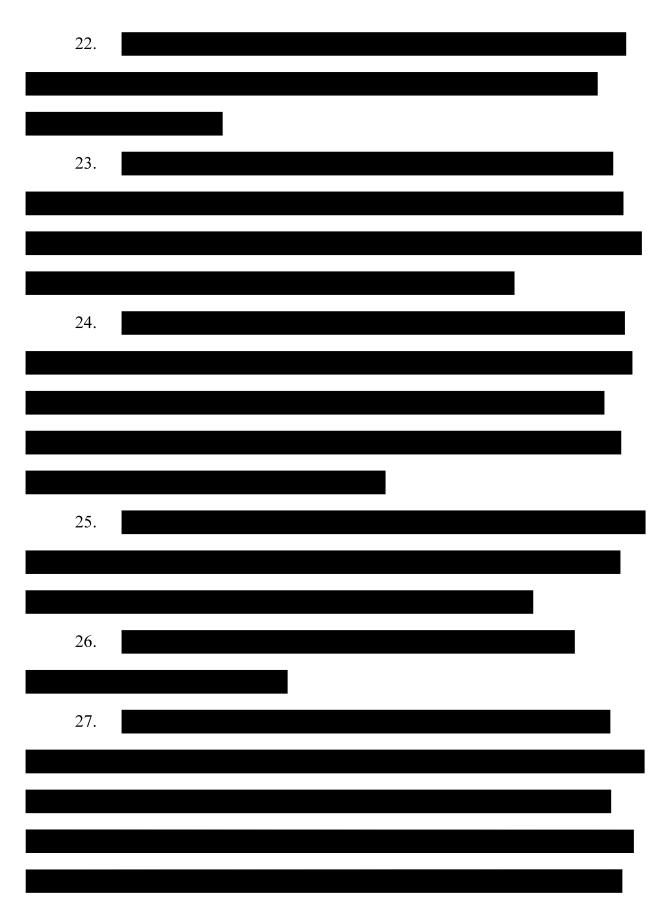
DECLARATION OF DANA J.
MOSS IN SUPPORT OF
DEFENDANTS' MEMORDADUM
OF LAW IN OPPOSITION TO
PLAINTIFFS' MOTION TO
COMPEL DISCOVERY

- I, Dana J. Moss, hereby declare as follows:
- 1. My name is Dana J. Moss and I am a Partner with the law firm of Cooley LLP. I am a member in good standing of the bars of Virginia and Washington D.C.
- 2. I submit this Declaration in support of Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Compel Discovery filed in the above captioned matter.
 - 3. I have personal knowledge of the facts set forth in this Declaration.
- 4. As part of serving as counsel to CenturyLink Defendants ("CenturyLink"), I am aware of
- 5. I also served as counsel to CenturyLink in *State of Minnesota v. CenturyTel Broadband Services LLC*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.) ("MNAG Action").

6.	The parties in the MNAG Action filed their Rule 26.06(c) Discovery Plan
on October	6, 2017.
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8.	The State of Minnesota, by its Attorney General ("MNAG")
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11.	
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	Exhibit 1.
13.	Counsel for CenturyLink
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14.	
	Exhibit 2.
15.	
16.	Exhibit 3.
17.	

18.	
19.	Plaintiffs suggest that CenturyLink
	See Plaintiffs' Memo. of Law in Supp. of
Their Mot.	to Compel Discovery at p. 10 and Plaintiffs' Ex. U
	Exhibit 4.
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28.	

I hereby declare under the penalty of perjury that the foregoing is true and correct. Executed this 4th day of March 2020, in Washington, D.C.

s/ Dana J. Moss
Dana J. Moss